

# Grant Delivery System (GDS) - WebGrants

## Information Security and Confidentiality Agreement



A signed GDS - WebGrants Information Security and Confidentiality Agreement is required by the California Student Aid Commission (the Commission) from any post-secondary educational institution accessing the GDS - WebGrants.

<b>I. Institution Section</b>	
<b>Primary Institution Name and Address</b>	<b>Primary Institution USED ID Code</b> —
<b>Additional Institution Name</b> (If the Authorized Official and System Administrator(s) are different at each institution, a separate Agreement must be completed.)	<b>Additional Institution USED ID Code</b> —

The institution(s) shown above agrees to comply with the following requirements as a condition of accessing the GDS - WebGrants of the California Student Aid Commission (the Commission):

1. Passwords and user identification numbers (IDs) are to be treated as confidential information. Employees of the institution shall not share passwords and IDs.
2. An Authorized Official (AO) of the institution will designate no more than two individuals as the institution's System Administrator. The System Administrator(s) will be granted the authority and responsibility to create or disable individual user accounts for that institution's staff access to the GDS - WebGrants. The Authorized Official will not have System Administrator's authority and responsibility.
3. Computerized files created pursuant to this agreement include confidential information. These files and the data contained within these computerized files will be maintained by the Commission consistent with federal and state privacy laws, and must be treated with the utmost confidentiality by all parties.
4. The institution shall take all reasonable precautions to protect the data in the system from unauthorized access, change or destruction. Data shall not be altered, destroyed, copied, uploaded, or downloaded from the system except as authorized in the approved External User Access Request forms.
5. The Commission reserves the right to revoke access to the GDS - WebGrants to any institution or individual staff member without notice.
6. Within five (5) working days of notice, the System Administrator will disable the password and ID of any employee whose change in employment status or duties no longer requires access to the GDS - WebGrants. Documentation of this action shall remain at the school.
7. The institution shall complete a new Agreement should the Authorized Official or System Administrator(s) leave the institution. The new Agreement must be filed no later than 5 days after a new Authorized Official or System Administrator(s) is appointed.
8. The institution will comply with all federal and California information security and confidentiality laws, including the Comprehensive Computer Data Access and Fraud Act (California Penal Code Section 502), Federal Privacy Act, and the Commission's security and confidentiality policies and procedures.
9. The institution will maintain a historical record that identifies to the Commission or its representative, the identification of the individual(s) who create or update GDS Web Grant transactions.
10. To the extent authorized by law and caused by the negligence or intentional misconduct of itself, its employees or agents, the institution will accept liability for any direct or consequential damages to the Commission and the GDS database.
11. The institution will ensure that information transmitted electronically or otherwise to the Commission has been examined and is complete and accurate to the best of its knowledge.

<i>I, the undersigned, certify that I am, as named in this agreement, an official of the institution and am authorized to act on its behalf. I have read and understand this agreement and certify the institution will comply with the requirements stated herein. As the institution's Authorized Official (AO), I hereby designate the individual identified below as this institution's System Administrator(s).</i>		
<b>Signature - Institution's Authorized Official (AO)</b>	<b>Print Name / Title</b>	<b>Date</b>
<b>E-Mail Address</b>	<b>Phone Number</b>	<b>Fax Number</b>
<i>I, the undersigned, certify that I am, as named in this agreement, the System Administrator(s). I have read and understand this agreement and certify that I will comply with the requirements stated herein.</i>		
<b>Signature - System Administrator 1 (SA)</b>	<b>Print name / Title</b>	<b>Date</b>
<b>E-Mail Address</b>	<b>Phone Number</b>	<b>Fax Number</b>
<b>Signature - System Administrator 2 (SA)</b>	<b>Print name / Title</b>	<b>Date</b>
<b>E-Mail Address</b>	<b>Phone Number</b>	<b>Fax Number</b>

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### Policy

The California Student Aid Commission (the Commission) and the post-secondary educational institution have a joint responsibility to protect the integrity and confidentiality of the data in the Commission's database. This is vital to the privacy of individual students. The GDS - WebGrants must be maintained in a legal and ethical manner.

**Article 1, Section 1, of the Constitution of the State of California defines pursuing and obtaining privacy as an inalienable right.**

#### The institution must:

- A. Identify at least two authorized individuals at the institution, one who is the Authorized Official and one who will act as System Administrator. You may identify up to two System Administrators. The System Administrator is to be designated by the Authorized Official. The System Administrator will have the authority and ability to add or disable individual users at the institution campus; the Authorized Official will not.
- B. Complete, sign and submit an Information Security and Confidentiality Agreement and a System Administrator's Access Request Form(s). All forms must be approved by the Commission prior to the institution gaining access to the GDS - WebGrants.
- C. Notify the Commission in writing within five (5) working days if the identity of the System Administrator(s) or Authorized Official changes. If a new Authorized Official is appointed: A new Agreement must be completed immediately and submitted to the Commission. If a new System Administrator(s) is designated: A new Agreement designating the new AO and a new System Administrator's Access Request Form must be completed immediately and submitted to the Commission.
- D. Establish administrative, technical and physical safeguards to protect the security and confidentiality of records, data and system access.
- E. Within five (5) working days, disable the account of any individual who ceases employment or whose change in employment status or duties no longer requires access to the GDS - WebGrants.
- F. Notify the Commission immediately of any security or confidentiality violation(s) by contacting the Commission's ITS Help Desk at 888.294.0148, Monday-Friday, 8:00am - 5:00pm PST.
- G. Establish training programs for institution employees regarding information security and confidentiality.
- H. Retain a copy of the Information Security and Confidentiality Agreement and a copy of all past / current System Administrator's Access Request Forms. Institutions are responsible for maintaining the names of all additional system users at their campus.

### Definitions:

<b>Commission:</b>	California Student Aid Commission.
<b>Authorized Official:</b>	Individual authorized by the institution to execute the Information Security and Confidentiality Agreement on behalf of the institution.
<b>System Administrator:</b>	Individual designated by the Authorized Official to be responsible for implementing procedures and ensuring adherence to all information security/confidentiality policies stated herein. The institution may use their existing ISO or they may designate a Financial Aid Office employee to act as the SA for purposes of the Commission's Grant Delivery System - WebGrants. Each institution may designate two System Administrators.
<b>Confidential Information:</b>	Information that identifies or describes an individual including, but not limited to, his or her name, social security number, physical description, home address and telephone number, education, financial matters, medical or employment history, including statements made by or attributed to the individual.

#### Mail forms to:

California Student Aid Commission  
Information Technology Services Division  
Attn: CSAC HELPDESK  
P.O. Box 419026  
Rancho Cordova, CA 95741-9026

**Retain a copy of this completed form.**

#### FOR COMMISSION USE ONLY.

Date Received: _____	Date Updated: _____
Help Desk Review: _____	Date: _____
ISO Approval: _____	Date: _____